

# REMARKS

In the Office Action, the Examiner has indicated that claims 12-13 are allowed, and claims 10, 11, and 19 are allowable.

The Examiner has rejected claims 1-8, 14-16, 18, and 20-24 under 35 USC 103. In addition, it appears that the Examiner continues to reject claims 1-8, 14-16, and 22-24 under 35 USC 112, 2<sup>nd</sup> paragraph.

New claims 25-26 have been added corresponding to allowed claims 12 and 13. Claims 1-8, 14-16, 18, and 20-26 are now pending.

Reconsideration of the application is respectfully requested based on the following remarks.

## **REJECTION OF CLAIMS UNDER 35 USC §112**

With respect to the rejection of claims 1-8, 14-16, and 22-24 under 35 USC 112, second paragraph, the Examiner asserts that the Applicant's arguments have been considered, but are not persuasive. Specifically, the Examiner asserts that the features upon which applicant relies 1) the default route is included in each of the routing tables, and 2) each of the virtual private networks may access the shared services via the default route that is in each of the routing tables are not recited in the rejected claim(s).

In response to the assertion that the feature 1) the default route is included in each of the routing tables is not recited in the rejected claim(s), Applicant notes that the claims specifically recite, "updating each of the plurality of routing tables to include the default route" or, alternatively, "updating each of the plurality of sets of routing information to include the default route." Thus, the claim language clearly recites that the default route is included in each of the routing tables (or sets of routing information).

The Examiner asserts that the feature each of the virtual private networks may access the shared services via the default route that is in each of the routing tables is not recited in the rejected claim(s). Applicant notes that the claim language clearly recites "routing" a packet that has been received using a routing table entry in one of a plurality of routing tables (or sets of routing information), where each of the routing tables (or sets of routing information) is associated with one of a plurality of virtual private networks. The claims clearly recite that each of the routing tables (or sets of routing information) is updated to include the default route. The claim language further recites the "default route to the network device providing one or more shared services being advertised by the network device providing one or more shared services, wherein each of the shared services is available to each of the plurality of virtual private networks." Clearly, a packet may be routed to (or from) one of the virtual private networks via one of the routing tables. Specifically, a packet may be routed via a routing table (or set of routing information) that includes the default route to the network device providing one or more shared services. In this manner, packets may be routed between the virtual private network and the network device providing one or more shared services. In other words, each of the virtual private networks may access the shared services via the default route that is in the routing tables (or sets of routing

information). Since the use of routing tables to route packets is well-known, Applicant asserts that the ability to access shared services via the default route in each of the routing tables (or sets of routing information) is clear from the rejected claims.

In summary, Applicant respectfully submits that the relationship between the shared services and the virtual private networks is clear from the claim language. Specifically, the shared services are provided by the network device. A default route to the network device is received and included in each of the routing tables associated with the virtual private networks. Thus, each of the virtual private networks may access the shared services provided by the network device via the default route identified in the corresponding routing table.

### **REJECTION OF CLAIMS UNDER 35 USC §103**

In the Office Action, the Examiner has rejected claims 1, 2, 6-8, 14-16, 18, 20, 21 under 35 USC §103 as being unpatentable over Liu et al., U.S. Pat. No. 6,928,082, ('Liu' hereinafter) in view of Prince, U.S. Pat. No. 5,852,606, ('Prince' hereinafter). Applicant respectfully traverses this rejection.

It is important to note that Liu fails to disclose or suggest a plurality of routing tables, as the Examiner suggests. Applicant notes that the Examiner refers to NAT 26a, 26b of FIG. 1 of Liu. However, Liu clearly discloses that these elements are NAT servers, not routing tables. Even if the NAT servers are interpreted to include routing tables or routing functionality, Liu fails to disclose or suggest the claim elements noted by the Examiner, as discussed below.

Applicant respectfully asserts that Liu fails to disclose or suggest "receiving a default route to a network device providing one or more shared services, the default route to the network device providing one or more shared services being advertised by the network device providing one or more shared services, wherein each of the shared services is available to each of the plurality of virtual private networks." In this rejection, the Examiner cites col. 8, line 7 and col. 2, lines 37-40 of Liu.

It appears that the Examiner is asserting that col. 8, line 7 of Liu discloses "receiving a default route to a network device providing one or more shared services." Applicant respectfully traverses this assertion. The opening of a proxy connection between a private network client and a destination device as disclosed in col. 8, line 7 is not equivalent to

receiving a default route to a network device providing one or more shared services. In fact, there is no reference to receiving a route to a network device providing shared services. Rather, it is clear that the private network client and the destination device are both clients, and that neither of these clients provides shared services. See e.g., col. 8, lines 41-45.

The Examiner further asserts that col. 2, lines 37-40 of Liu disclose “the default route to the network device providing one or more shared services being advertised by the network device, wherein each of the one or more shared services is available to each of the virtual private networks.” Applicant respectfully traverses this assertion. Col. 2, lines 37-40 of Liu merely disclose “establishing a call signaling connection between the first telephony client located on a private network and the second telephone client on the Internet.” Clearly, neither the first telephony client nor the second telephony client provides one or more shared services to a plurality of virtual private networks. In fact, both of these devices are described as “clients.” Neither of these clients provides shared services to one virtual private network, much less a plurality of virtual private networks. Moreover, nothing in Liu discloses or suggests the advertisement by a network device providing shared services of a default route to the network device. Clearly, establishing a call signaling connection cannot be interpreted as an advertisement by either of the clients.

Applicant respectfully asserts that Prince fails to cure the deficiencies of Liu, as set forth above. Thus, the combination of the cited references would fail to operate as claimed. Accordingly, Applicant respectfully asserts that claims 1, 2, 6-8, 14-16, 18, 20, 21 are patentable over the cited references.

In the Office Action, the Examiner has rejected claims 3-5 under 35 USC §103 as being unpatentable over Liu and Prince, and further in view of Palnati et al, U.S. Pat. No. 5,991,297, (‘Palnati’ hereinafter). Applicant respectfully traverses this rejection.

Palnati fails to cure the deficiencies of the references noted above. Accordingly, Applicant respectfully asserts that claims 3-5 are patentable over the cited references.

The dependent claims depend from one of the independent claims and are therefore patentable for at least the same reasons. However, the dependent claims recite additional limitations that further distinguish them from the cited references. The additional limitations

recited in the independent claims or the dependent claims are not further discussed, as the above discussed limitations are clearly sufficient to distinguish the claimed invention from the cited references. Thus, it is respectfully requested that the Examiner withdraw the rejection of the claims under 35 USC §103(a).

## **SUMMARY**

If there are any issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 504480 (Order No. CISCP340).

Respectfully submitted,  
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